

ADMINISTRATIVE-INTERNAL USE ONLY

MEMORANDUM FOR: Chief, Programs and Procedures Staff

FROM :

Chief, Position Management & Compensation Division

SUBJECT : Employee Suggestion 79-174 (Position Management Surveys)

1. In response to the suggester's rebuttal to PMCD's initial evaluation of this suggestion, we feel the following will satisfy the questions raised.

2. With regard to the question concerning inequities in the current position management program, this is not felt to be a major problem with the survey program. The primary objective of the program is to obtain both job and pay equity within a component being surveyed, not necessarily across major organizational or component lines. This objective has been reasonably achieved under the existing position management program.

3. The implementation of the suggested program, including the proposed handling of organizational and position changes, would not be feasible. This is so because there is not sufficient manpower available in PMCD, and current employees lack broad classification experience. In addition, undertaking the suggested program would prohibit PMCD from performing component surveys.

4. The rebuttal speaks to the present survey program limiting PMCD's provision of management advice and assistance to once every three to five years. This is a misconception. Even though a component may be surveyed once every three to five years, in the interim, PMCD continues to respond to requests for position management advice and assistance. PMCD is always available to respond to such requests after consideration of the urgency and immediate priorities.

5. Exception is taken with the contention that CIA position standards are not coordinated in their development. The PMCD general policy is to coordinate new classification evaluation criteria with all affected components (e.g., Information Control and Records Series, Reports and Requirements Officer, and Imagery Analysis).

ADMINISTRATIVE-INTERNAL USE ONLY

6. In summary, the suggester has not offered any further justification of this proposal, that would alter PMCD's original evaluation.



STATINTL

DISTRIBUTION:

- O + 1 - Adsc
- 1 - D/Pers
- 1 - PSS
- 1 - PMCD

STATINTL

OP/PMCD/PSS  /27 June 1979

ADMINISTRATIVE-INTERNAL USE ONLY

UNCLASSIFIED

5 June 1979

MEMORANDUM FOR: Executive Secretary, Suggestion and Achievement Awards Committee

SUBJECT : Rebuttal to Evaluation of Suggestion 79-194, Position Management Surveys

1. I respect the comments contained in the evaluation of my suggestion. However, I certainly do not agree with the findings therein. The present system is not effective and even more importantly, it is not equitable.

→ 2. The evaluation report said that cyclical surveys were indispensable because Agency components requested them and that organizational and position changes frequently occur. Cyclical surveys have been in existence for many years and yet we have severe inequities throughout the position management program. If the cyclical system was sound, why would this problem exist? Evaluation remarks indicate we would no longer be able to effectively handle organizational and position changes. Under my proposed program, these changes would be handled quicker and more efficiently.

3. The evaluation report also said that component surveys were a primary vehicle for providing position management advice and assistance. Under the current program, this would suggest every three to five years. What kind of philosophy is this? Position management advice and assistance should take place continuously and would under my proposal. This is one of the extremely valuable points in my proposal. Because the directorates would be playing an integral role in the new program, there would be continual contact.

4. The evaluation goes on to say that the current standards program insures the same grade equity as my proposed occupational approach. This is simply not true and can be substantiated very easily. Current standards are not fully coordinated in their development as the evaluation report indicates. This is also simply not true and can be substantiated.

5. I certainly agree that the strength of any program must have an effective charter and full support from top management within the Agency. PMCD has a monumental task and I firmly believe that my proposal would be a better approach. I believe that much of the response to my proposal has to do with attitude. I do not feel that my proposal would have the impact as indicated in the evaluation report; i.e., annual review

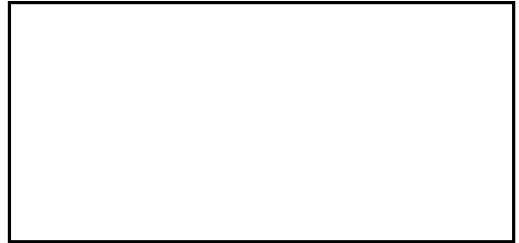
UNCLASSIFIED

SUBJECT: Rebuttal to Evaluation of Suggestion 79-194, Position
Management Surveys

of all positions, number of classifiers needed, sheer volume of additional work imposed on all levels, grade point availability, etc.

6. Obviously, we have a basic disagreement and I strongly feel that my proposal would be more effective and establish a better relationship between PMCD and the components. PMCD currently picks and chooses between two standards. I do not understand how this can be depicted as equitable.

7. I would appreciate another review of my proposal and an evaluation from MAG or another such group. I would also be happy to meet with anyone or any group to discuss this proposal. I realize that my proposal represents a new and challenging approach. I have recently read the NAPA report and feel that my proposal represents some of the changes that are necessary. I strongly believe in the Agency and only wish to see a more equitable program for everyone. STATINTL



UNCLASSIFIED

EVALUATION REPORT

TO: Executive Secretary
Suggestion and Achievement
Awards Committee

SUGGESTION NO.

79-194

SUSPENSE DATE

INSTRUCTIONS: Please complete this form in detail to guide the Suggestion and Achievement Awards Committee in making a final determination the merits of this proposal. Retain third copy.

1. ACTION RECOMMENDED

☐ ADOPT☒ DECLINE☐ OTHER (Specify):

DATE ADOPTED

2. REASONS FOR RECOMMENDATION (If more space is needed, use plain paper)

The suggested substitution of occupational studies for cyclical position management surveys of Agency components is deemed impractical and cannot be supported. A continuing program of cyclical surveys is indispensable because not only do Agency components request them, but the organizational structure and position requirements frequently change and staffing complements should reflect such changes on a timely basis. Component surveys are a primary vehicle for providing position management advice and assistance to operating officials.

On the other hand, the PMCD standards program represents much the same approach to insuring grade equity Agency-wide as the suggested occupational studies. The various series and occupational standards apply to the positions covered wherever found. They are fully coordinated in their development with the affected components. Another aspect of PMCD production of valid and equitable evaluation-criteria is the selection of Agency benchmark positions in Factor Evaluation System format, developed in the course of component surveys, for use in current and subsequent surveys throughout the Agency.

The following is keyed to the "(Proposed) Position Management Program" attached to the suggestion:

- II. Often over the years, relocation of PMCD, particularly in the Office of the Comptroller, has been suggested and considered. However, it is felt the movement of PMCD would not directly increase or decrease its effectiveness. Rather, PMCD effectiveness depends on the content of the PMCD charter and how it is enforced by senior management.

3. TANGIBLE FIRST-YEAR SAVINGS (Man-hours, material, equipment, etc.)

4. INTANGIBLE BENEFITS (See guide on reverse side of third copy)

5. WHAT OTHER OFFICES, DIVISIONS, ETC. MIGHT ALSO USE THIS IDEA?

(Use plain paper to continue report, if necessary)

DATE
2 May 1979

Review Staff

FORM 5-77 244b USE PREVIOUS EDITIONS



UNCLASSIFIED

INTERNAL
USE ONLY

CONFIDENTIAL



SECRET

(43)

II. B A committee with representation from all occupational groups would be highly impractical since there are over 50 occupational groups. Also for this group to establish evaluation criteria by grade level for each occupational grouping would require the review and preparation of several hundred standards - a monumental task.

II. B 4 An annual review of all Agency positions is virtually impossible if it is to be conducted effectively. The ratio of classifiers to the number of positions in the Federal Government is one classifier for 500 positions. The ratio in the Agency is 1 to 1500 positions. It would require approximately 15 additional classifiers to accomplish this task.

IV. The review procedures outlined in this section, while commendable from a managerial standpoint, are not practical because of the sheer volume of additional work it imposes at all levels but the end result is what PMCD (para IV. f) would automatically implement whatever changes are necessary. The Agency is under a very tight average grade control and many changes cannot be made unless grade points are available. Also the suggestion implies by this procedure that the managers will determine the grade level of a given position. If this is so, many inequities would result throughout the Agency.

In summary, a balanced program of component surveys and development of equitable position evaluation criteria is required; periodic reviews of Agency planning documentation are presently conducted; and the desirability of relocating PMCD is debatable and less significant to its effectiveness than its charter and enforcement policy.

TITLE OR SUBJECT OF SUGGESTION		SUGGESTION NO.
Position Management Surveys		79-194
PRESENT METHOD		
<p>Position Management Surveys are currently conducted on a 3 - 7 year cyclic system throughout the Agency. The years may vary depending upon available resources from the Office of Personnel. The length of time for an office survey will mainly depend upon office size, number of different occupations, recommended adverse actions, and available manpower to conduct the survey. Some surveys could take up to a year or more. In a complete survey, all positions regardless of occupation are reviewed.</p>		
I SUGGEST		
<p>My suggestion is twofold. I believe that all office surveys, as they are currently performed, should be discontinued and be replaced with a new program per attached. As part of the new proposed program, I also feel that the Agency should perform occupational studies rather than complete office studies involving all occupations.</p>		
ADVANTAGES		
<p>See attached.</p>		

FORM 244
(2-74)

USE PREVIOUS EDITIONS

☐ SECRET

☐ CONFIDENTIAL

☐ ADMINISTRATIVE
INTERNAL USE ONLY

E _____, IMPDET CL BY _____

☐ UNCLASSIFIED (47)

ADVANTAGES

I feel that the advantages far outweigh the present system in that it would strengthen the Agency's Position Management Program and be more cost effective. The new program would be structured to provide the following advantages:

A. Implementation of standards by occupation would be fair and equitable by applying them across across Agency or directorate lines. The present system is not fair and equitable because application of applied standards could reward or penalize the surveyed office. By that, the surveyed office could gain or more than likely, lose good people because grades are determined to be lower than in other unsurveyed offices throughout the Agency. For example, if the journeyman grade for publication officers is established at GS-12 for the surveyed office, then those personnel in that position could and do apply for positions in other unsurveyed offices. Meanwhile, the surveyed office loses good people based upon the unequitable situation caused by cyclic surveys.

B. This Agency currently has many positions paying different levels of pay for the same job. This is an intolerable situation that will not correct itself for the next ten years, if at all, under our present program.

C. Implementation would be far easier to accomplish if office heads felt they were not being "guinea pigs" as once described to me by an office head. In other words, he did not want to be first if everyone else had to wait for a survey as it would penalize his employees.

D. Position Descriptions (PD's) would be current in that they would be updated annually. Under the present system, PD's are generally updated before a survey which means that many are more than three years old. This again is an intolerable situation in that PD's are a management tool and they are also used in performing comparability studies by PMCD.

E. Implementation of occupational studies would be easier from the standpoint that substantive personnel would play an integral part in establishing evaluation criteria.

F. The cost for implementing an occupational program would be far less costly than the present system. Once evaluation criteria is established for each occupation, the Agency would only have to maintain them as proposed in the annual review. Also, once PD's are written for each occupation, they may be maintained on microfisch thereby eliminating the present cumbersome filing system which impairs comparability studies.

G. It is difficult to measure savings involved. Perhaps there would be increased costs during implementation stages of the proposed program, but that would dramatically decrease as the need for occupational studies are completed. Once the program is fully implemented, there would be a tremendous savings over the present program. I know of one complete survey which cost well over \$100,000.00 during a two-year period. Because this survey resulted in a substantial number of adverse actions, the component has asked for a general reaudit. Costs could conceivably exceed \$300,000 before anything is finalized.

Attachment:
(Proposed) Position Management Program

ATTACHMENT

(PROPOSED) POSITION MANAGEMENT PROGRAM

- I. INTRODUCTION. This notice formally establishes a major change in the Agency's Position Management Program. This program is designed to:
- A. Promote a position structure which best serves mission requirements by providing optimum balance among economy, efficiency, skills utilization, attraction and retention of a competent workforce, and personnel development.
 - B. Provide a vehicle by which the Agency more effectively controls its organization and position structure.
 - C. Implement an annual review of all Agency positions to determine if they are needed, and if they are accurately described and classified.
- II. ADMINISTRATION. This program will be administered by (currently Position Management and Compensation Division (PMCD) - feel this is an inappropriate place and should be on Comptroller's Staff) which reports directly to the (Director of Personnel - should be Comptroller). This office will be responsible for recommending Agency policy and procedure to the DDCI on all matters pertaining to the Agency's Position Management Program. This office will also be responsible for:
- A. Certifying the need and current accuracy of all Agency positions by occupation, analyzing position structures, and performing organizational structure studies.
 - B. Within program guidelines established by the DCI and the Comptroller, the following areas are delineated:
 1. PMCD (will use this for purposes of this paper) is responsible for establishing an ad hoc committee, with representation from all occupational groups, for the initial review and establishment of evaluation criteria by grade level for each occupational grouping.
 2. PMCD will be responsible for implementing established evaluation criteria in the control of all positions.
 3. PMCD is responsible for: a) conducting regular position reviews through office heads, b) analyzing the results in conjunction with component personnel, c) formulating and recommending a final position structure, and d) determining the need for changes in position content.

4. PMCD is responsible for formulating an annual review schedule of all Agency positions. PMCD will disseminate all appropriate review documents, review results, and monitor the day-to-day review segment of the overall program.
5. Component personnel will be responsible for assisting PMCD in this annual review of positions by certifying their accuracy and as to whether the position is needed or not.

III. REVIEW OBJECTIVES. The review mechanisms of this program have been developed to aid supervisors in discharging their personnel management responsibilities. Broadly, the objectives are to:

- A. Accomplish a timely and meaningful review of positions and position structures.
- B. Determine position changes.
- C. Provide advice and assistance to supervisors on position management matters on a planned basis rather than ad hoc.

IV. CONDUCT OF THE REVIEW. PMCD will establish an annual review schedule for the Agency which will be issued at the beginning of each calendar year. Designated officials in each organization will be issued necessary instructions and Position Review List forms at least 15 working days before the survey is to begin. These officials will coordinate the review with lower level supervisors for action within their respective areas. The review process will consist of the following major steps:

- A. The Position Review List (PRL) (Exhibit I) will be issued by PMCD showing all authorized positions by organizational element.
- B. The official in charge of the review will subdivide the PRL for distribution to all first-line supervisors for review.
- C. The supervisor conducting the review will certify the accuracy of each PD.
 1. Supervisors should insure that employees review their PD.
 2. Any changes that the supervisor or employee feels are necessary will be corrected and submitted along with the certified PRL.
 3. The "Position Needed" column of the PRL will be completed as follows:
 - a. If the position is needed, place an (X) in the "yes" column.

b. If the position is not needed, place an (X) in the "No" column. Indicate in the "Remarks" column the reason thereof.

4. The "Position Description Accurate" column of the PRL will be completed as follows:

- a. If the PD is determined accurate, place an (X) in the "Yes" column.
 - b. If the PD is determined not to be accurate, place an (X) in the "No" column and submit new PD to the PRL.
- D. After considering all proposed actions, including new positions, sign the reverse side of the PRL and forward to the component reviewing official.
- E. Upon review by the component reviewing official, sign the reverse side of the PRL and forward to PMCD.
- F. PMCD will review all component PRL's and make the necessary changes to component staffing complements.

*In off
com*

SUBJECT: (Optional)

FROM: EXECUTIVE SECRETARY
 SUGGESTION AND ACHIEVEMENT
 AWARDS COMMITTEE
 815 AMES BUILDING

EXTENSION

NO.

79-194

DATE

14 June 1979

STATOTHR

TO: (Officer designation, room number, and building)

DATE

RECEIVED

FORWARDED

OFFICER'S INITIALS

COMMENTS (Number each comment to show from whom to whom. Draw a line across column after each comment.)

1006 Ames Bldg

For OP review and re-evaluation, please.

Am not inclined to send this to MAG as suggester asks until we receive OP's reactions and recommendations. (As you know, PMCD has been through a lot since your early May evaluation).

STATINTL

MAJOR ACTIVITIES IN WHICH PMCD IS INVOLVED

1. Cyclical Survey Program.
2. Respository and maintenance of Agency-wide position data (PD's).
3. Ongoing maintenance program in reaction to FY adjustments in position allocations and to component requests for reorganization and/or individual position review.
4. Development and maintenance of position standards and benchmarks.
5. Intra and inter Agency position comparison studies.
6. Maintenance and updating of special wage schedules (GP, GA, STAT etc.).
7. Interpreting and implementing regulations and laws re. pay practices and procedures - FLSA, prevailing rate regulations, etc.
8. Advising D/Pers on component requests for non-standard work schedules, and various other types of pay policies - overtime, premium pay, etc.
9. Training - a periodic PMCD orientation program for personnel careerists and eventual development of course material on position management and classification for insertion in Agency managerial courses.

.....
COMMENTS RE. PMCD ACTIVITIES AND POSSIBLE ALTERNATIVE APPROACHES

I base the following remarks on a single premise which is probably not acceptable within this division namely that this Agency's management is not and never has been serious in wanting a sound classification program, but since the Agency agreed to substantial conformance early in its existence it does want to give the appearance of a classification program. Despite some recent indications to the contrary, i.e., the Van Damm report and several instances where the DDA has held the line on PMCD allocations, I believe that management has little real interest in what we do as long as that Agency stays within its authorized average grade and we do not cause too many ripples. Thus I feel within limits we can operate pretty much as we see fit as long as we give the appearance that the Agency has a sound classification program. This leaves it to us to determine what has to be done to have a "sound" program within limits of our personnel resources and talents. Based on this premise I believe we should probably make some adjustments in things that we do.

1. Cyclical Survey Program: It was originally envisioned that through this program each Agency component would be surveyed, including complete desk audits, at least every three years. This goal has never been met and

indeed some components have never been surveyed since the program's initiation in January 1971. Four factors appear to impact on our inability to meet this goal: (1) manpower resources allotted to the program; (2) requirement that those personnel devoted to this program have to handle a variety of other activities which, although related to surveys, extracts a great many manhours away from survey activities; (3) inability always to get good cooperation from the components; and (4) survey methodology which requires full desk audits of each and every position.

I think two basic questions have to be asked: (1) is the survey program worthwhile and, if so, what if anything can be done to improve the program; or (2) if it is not worthwhile is it feasible to abandon it and concentrate on the other activities conducted by the division.

First, assuming the program is worthwhile what can we do to improve it? One obviously thing we could do is lengthen the program goal to four or five years for total coverage of all Agency components. Or, we could maintain the three year goal and see if we can change or improve on some of the inhibiting factors. Currently nine classifiers (not counting the supervisor) are being devoted to the survey program. Two of these classifiers are relatively new and have to be considered in a training phase. One professional position in the division is vacant and we are scheduled to receive four or five additional positions. Were six additional people added to the survey program (for a total of fifteen) we could maybe expect to have a fully trained unit of fifteen people available in early 1977. There are approximately [REDACTED]

STATINTL
STATINTL
STATINTL

[REDACTED] This comes to [REDACTED] At first glance this appears to be a very reachable goal; however, past experience when we had 14 or 15 classifiers participating in the program indicates that even with the new personnel we will be unable to meet our goal. To a large part this can be accounted for by the fact that those personnel participating in the survey program also participate in the other division activities especially in the maintenance program. While the Policies and Standards Branch may relieve some of this burden, most will remain since this branch will be undertaking standards development as a major function and this was not even being performed in the past. These other activities also appear to be expanding as indicated by the time necessarily devoted to implementation of FLSA. So if past experience indicates the survey goal cannot be met with 15 classifiers, how many would be required? I do not believe a sufficient number of personnel to meet this goal can be accurately defined nor is it likely we would get the people required if we could define a number. Too many variables come into play, i.e., how many component requests for reorganization reviews or reviews of individual actions will be forthcoming, how much time is going to have to be devoted to FLSA implementation and maintenance, how much time and effort is going to be required to implement FES, etc.

STATINTL

Can we improve the cooperation we get from the components? To some extent the answer to this question is yes and I believe this is an area which has shown improvement since the program's inception. But I believe there is a definite limit to how much cooperation we can expect. Classifiers inherently are looked upon as adversaries who will be tolerated as long as they don't get in the way too much. A survey by its nature is somewhat disruptive and an operating component wished to avoid as much disruption as possible.

One area we could change to possibly improve our ability to meet the survey goal would be to change our methodology. In lieu of complete desk audits, we could try a program of reviewing component job descriptions, selective sampling and discussions with supervisors. Inherent in this method would be the need for good job information. Supervisory certification along with a more intensive program of counseling on the preparation of job descriptions would probably help. The actual time savings, if any, in adopting this new methodology is unknown. But if we plan to continue the survey program as well as handle the other activities of the division, it appears that methodology is probably the best area for improvement and perhaps a trial run using the sampling technique should be attempted to see what time savings can be accomplished and get the reaction of the classifiers and the component.

Secondly, we should consider whether or not the survey program should be abandoned. What is accomplished with a survey? After the conduct of a survey we have a record in the form of a survey report of what we generally feel is a valid set of recommendations which if implemented will maintain the integrity of the Agency classification and position management program. But what happens if the majority of the recommendations are not adopted? As far as I can see, not much. A component will generally agree to effect those changes which are offsetting, but will resist any changes which might result in a lowering of the average grade or upper level ceilings. They might appeal if they feel they have a good case for upgrading positions. Is this worth the time and effort devoted to the survey program or could we be more effective by devoting much more time to the maintenance program? It appears to me that we put way too many positions on the books as "pending review" especially during fiscal year planning paper reviews. Certainly this is caused by the time factors involved and the fact that we are usually up to our necks in surveys during this time frame. It appears we might be better off if we did a better job on the maintenance program in the first place, which would require less need for survey programs to identify all the mis-allocations often caused by the lack of attention paid to the maintenance program in the first place. This would not preclude us from conducting a survey should we feel there is a need, but it would shift the emphasis from surveys to maintenance.

2. Responsitory and maintenance of Agency-wide position data (PD's). This appears to me to be an area in which we have been most lax, and yet one which could be the most beneficial especially if we curtailed or abandoned the cyclical survey program. We don't know how many jobs we have covered

by job descriptions (although legally we should have them all covered), we don't know how many are current, how many adequately describe the actual duties of the position, few, if any, have evaluation statements which are necessary for comparison, etc. Why not? Other things, especially the survey program has taken precedent. We have not had the time nor perhaps the motivation to want to improve on the component prepared descriptions. We conduct complete desk audits of all positions surveyed, but how much of the information ever goes from the notebook to the official Agency record? Why do we need current job descriptions in the first place? (1) Classification policy in government is that every position will be covered by a position description; (2) Whitten Amendment requires that all positions be reviewed annually; (3) FLSA requires that positions be classified as to their exempt or nonexempt status; (4) good PD's will be required for development of benchmarks and standards under FES; and (5) they are necessary for any attempt at inter-Agency comparison studies.

I believe a major effort should be made to convince Agency management that we require (or maybe more persuasive would be that FLSA and the Whitten Amendment require) current job information or at least recertification of existing job information on a yearly basis. We could suggest that the PD replace the LOI since in most instances the PD is just an expansion of the LOI and thus "two birds could be killed with one stone". This would enable us to accurately state to any inquiring body that we have current job information on all our positions, comply with FLSA and Whitten Amendment requirements, and, if the survey program was curtailed or abandoned, let the individual classifiers identify areas which appear to require review.

3. Ongoing Maintenance Program. To my mind this is the area to which we should devote more or all of our classification effort. One reason is that in this area we are most visible and most vulnerable. Components are coming to us with requests and not us seeking their cooperation. If we say we can't handle the request on a timely basis then we are looked at as inefficient and bureaucratic. On the other hand if we do a hurry up job we are probably hurting our own cause in as much as the positions will be found at some later date to be incorrectly allocated. In concentrating on this area we could probably have the most impact and also have the time to add, delete or otherwise change the component job descriptions based on the desk audits and have the time to prepare meaningful evaluation statements which could go along way in achieving grade comparability within the Agency. Some will argue that in concentrating on this area we will not be able to get as involved in "position management" and all that that term implies. I would counter by stating that except for our component title "PMCD" no where in the regulations does it indicate that anything besides position classification is in our charter, and also I think we could identify such things as underutilization, excessive layering, improper clerical/technical/professional ratios, unnecessary positions, etc. through this effort with yearly position description reviews. Also I believe we need to devote much more time on reviewing FY planning papers to make sure that what is done is based on sound classification principles rather than merely adjustments to the TO's

which do not affect average grade and upper level ceilings. Yearly receipt or certification of current job information would probably also assist in this area.

I don't have any comments on the other major activities of the division (4 to 9). I frankly don't have a very good feeling yet as to what is going to be involved in the standards and benchmark development at this stage although I imagine it is going to be a painstakingly slow process to begin with. The other activities I believe are valid and we should and will continue to perform them.